

February 14, 2025

**VIA ECF**

Hon. Victoria Reznik  
United States Magistrate Judge  
United States District Court for the Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: Graham et al v. Vassar College, No. 7:23-cv-07692

Dear Judge Reznik:

The parties submit this joint status letter pursuant to the Court's Order, dated December 27, 2024 (ECF No. 64).

**Discovery.** As set forth in the parties' prior joint status letter, Plaintiffs and Defendant both served and responded to one another's written document requests and interrogatories, and the parties also exchanged initial disclosures. The parties continue to meet and confer to try to resolve any disagreements on these responses. On February 12, 2025, Defendant served supplemental document requests on Plaintiffs, which seek additional, specific documents, including communications, that Defendant anticipates will be obtained through electronic discovery.

The parties prepared and filed a proposed Protective Order and proposed ESI Protocol for this case, which the Court entered on January 29, 2025. Now that both documents have been entered, the parties are preparing to exchange productions of confidential and highly sensitive documents, data, and ESI, subject to the Protective Order and ESI Protocol.

**Settlement.** There have been no discussions of settlement since the parties' October 10, 2024 case management statement. See ECF No. 58 at 2.

Respectfully submitted,

SEYFARTH SHAW LLP

*/s/ Maria Papasevastos*

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